

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

**SIMRANJIT SINGH, a/k/a SHALLY
SINGH,**

Defendant.

) Criminal No. 8:22-CR-199 (MAD)

) **Indictment**

) Violations: 8 U.S.C. § 1324(a)(1)(A)(v)
) [Conspiracy to Commit Alien
) Smuggling]
) 8 U.S.C. § 1324(a)(2)(B)
) [Alien Smuggling]

) Nine Counts

) County of Franklin
) Offenses:

THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Commit Alien Smuggling]

On or about March 17, 2020, in Franklin County in the Northern District of New York, and elsewhere, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, conspired with others to commit alien smuggling by, knowing that one or more persons were aliens, that is three aliens believed to have the initials G.S., M.S., and P.S., did bring to the United States in any manner whatsoever, such persons at a place other than a designated port of entry, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and (a)(1)(A)(v)(I). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(B)(i).

COUNT 2
[Alien Smuggling]

On or about March 17, 2020, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of the fact that an alien believed to have the initials G.S. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Two was the defendant's first violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

COUNT 3
[Alien Smuggling]

On or about March 17, 2020, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of the fact that an alien believed to have the initials M.S. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Three was the defendant's second violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

COUNT 4
[Alien Smuggling]

On or about March 17, 2020, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of the fact that an alien believed to have the initials P.S. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Four was the defendant's third violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

COUNT 5
[Conspiracy to Commit Alien Smuggling]

On or about October 7, 2020, in Franklin County in the Northern District of New York, and elsewhere, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, conspired with others to commit alien smuggling by, knowing that one or more persons were aliens, that is one alien believed to have the initials R.K., bring to the United States in any manner whatsoever, such person at a place other than a designated port of entry, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and (a)(1)(A)(v)(I). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(B)(i).

COUNT 6
[Alien Smuggling]

On or about October 7, 2020, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of

the fact that an alien believed to have the initials R.K. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Six was the defendant's fourth violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

COUNT 7
[Conspiracy to Commit Alien Smuggling]

On or about March 4, 2021, in Franklin County in the Northern District of New York, and elsewhere, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, conspired with others to commit alien smuggling by, knowing that one or more persons were aliens, that is two aliens believed to have the initials G.S. and M.S., bring to the United States in any manner whatsoever, such persons at a place other than a designated port of entry, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and (a)(1)(A)(v)(I). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(B)(i).

COUNT 8
[Alien Smuggling]

On or about March 4, 2021, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of the fact that an alien believed to have the initials G.S. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That

violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Eight was the defendant's fifth violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

COUNT 9
[Alien Smuggling]

On or about March 4, 2021, in Franklin County in the Northern District of New York, the defendant, **SIMRANJIT SINGH, a/k/a SHALLY SINGH**, knowing and in reckless disregard of the fact that an alien believed to have the initials M.S. had not received prior official authorization to come to, enter, and reside in the United States, did bring to the United States in any manner whatsoever, such alien, in violation of Title 8, United States Code, Section 1324(a)(2). That violation was done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii). Count Nine was the defendant's sixth violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), in violation of Title 8, United States Code, Section 1324(a)(2)(B).

Dated: June 8, 2022

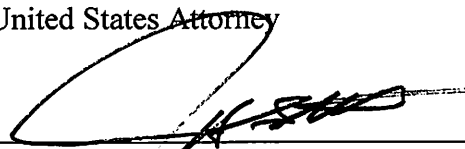
A TRUE BILL,

*name redacted

Grand Jury Foreperson \ _____

CARLA B. FREEDMAN
United States Attorney

By:



Jeffrey C. Stitt
Assistant United States Attorney
Bar Roll No. 520195